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CCN #: 011412

Date:

Dear Dr. Gibbs:

**CONTRACT NO. DE-AC06-96RL13308 – W375 – RESPONSE TO DESIGN PROCESS
INSPECTION REPORT, IR-00-001 (CCN 011190)**

Reference: CCN 011190, Letter, D. C. Gibbs, DOE/RL, to M. J. Bullock, BNFL Inc.,
“Design Process Inspection Report, IR-00-001,” 00-RU-0210,
dated February 8, 2000.

This letter and attachments are being issued as our complete response to the referenced letter.

During the week of January 10, 2000, the Regulatory Unit (RU) conducted an inspection of the River Protection Project-Waste Treatment Plant’s Design Process. As a result of the inspection, the RU identified three findings and one inspection follow up item.

The findings identified are as follows:

- (1) Four examples of failure to follow procedures. These examples included: failure to issue an approved surveillance schedule, failure to generate surveillance checklists, failure to use Design Control Checklists, and failure to properly control design review actions (Attachment 1).
- (2) Lack of proceduralization or implementation of the Integrated Safety Management Plan, Section 3.13 requirement for testability and inspectability consideration in the design process (Attachment 2).
- (3) Quality Assurance organization not effectively addressing the Quality Assurance Program and Implementation Plan (QAPIP) requirement to review selected engineering documents (Attachment 3).

The inspection team identified one follow-up item: Lack of procedures or implementation of QAPIP requirements to define and specify data quality requirements (Attachment 4).

This letter responds to these findings and follow-up item identified in the inspection report, IR-00-001. In addition to the specific remedial and corrective actions identified in the attachments, the BNFL Inc. Project Quality Improvement Action Plan addresses broader ranging issues relevant to these findings. These issues and schedule for corrective actions have been previously discussed with the RU.

Also provided is a disk in Microsoft Word format containing this letter and attachments (Attachment 5).

If you have any questions or if we can be of further assistance, please call Dennis Klein at (509) 371-4867 or Don Edwards at (509) 371-4871.

Yours sincerely,

A. J. Dobson
Manager, Operations and Safety

KDL/jca

- Attachments:
1. Response to Finding IR-00-001-01-FIN
 2. Response to Finding IR-00-001-02-FIN
 3. Response to Finding IR-00-001-03-FIN
 4. Response to Follow-up Item IR-00-001-04-IFI
 5. Disk with Letter CCN 011412 and Attachments